

John M. Pierce (Bar No. 250443)
jpierce@johnpiercelaw.com
JOHN PIERCE LAW P.C.
21550 Oxnard Street, 3rd Floor
Woodland Hills, CA 91367
Tel. (321) 961-1848
Attorney for Defendant
Rowland Marcus Andrade

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

ROWLAND MARCUS ANDRADE,

Defendant

Case No.: 3:20-cr-00249-RS

**DECLARATION OF JOHN PIERCE IN
SUPPORT OF ADMINISTRATIVE
MOTION**

**DECLARATION OF JOHN M. PIERCE IN SUPPORT OF ADMINISTRATIVE
MOTION**

I, John M. Pierce, declare as follows:

1. I am counsel of record for Defendant Rowland Marcus Andrade in the above-entitled action and submit this declaration based on personal knowledge obtained through my direct representation of Mr. Andrade, review of relevant case materials, and communications with him and his medical providers. If called as a witness, I could and would testify competently thereto.
2. At sentencing, the Court set Mr. Andrade's self-surrender date as October 31, 2025, in part to accommodate his scheduled colonoscopy on October 14, 2025.

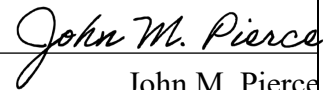
- 1 3. In addition to that procedure, Mr. Andrade requires surgical intervention on his left ankle
2 due to a chronic injury that causes him excruciating pain, an abnormal gait, and
3 significant mobility impairment. On August 6, 2025, orthopedic surgeons evaluated the
4 condition and initially planned surgery to remove or reconstruct portions of the damaged
5 bone and tissue. However, the operation was deferred in favor of a non-surgical cortisone
6 injection, which proved ineffective. On October 8, 2025, his treating physicians
7 determined that his three-month average A1C blood sugar level remained above the
8 surgical threshold, primarily due to delays in insulin (Novolog) production and delivery
9 by the V.A. hospital during the month of August 2025. Those delays prevented the
10 scheduling of the surgery at that time.
11
12
- 13 4. On October 9, 2025, following consultation with his endocrinologist, Mr. Andrade began
14 a program of daily glucose monitoring via a mobile health application under the
15 supervision of his medical team to normalize his A1C level. A follow-up retest is
16 scheduled for November 6, 2025, and his physicians expect the results to clear him for
17 surgery, likely to be performed in November or December 2025, followed by a recovery
18 period. Mr. Andrade will provide prompt updates to the United States Attorney's Office
19 and the U.S. Probation Office regarding the surgery date, facility, and anticipated
20 recovery timeline as soon as those are confirmed.
21
22
- 23 5. As new counsel of record, my firm is actively engaged in obtaining the complete
24 discovery set and work product from prior counsel to facilitate preparation of Mr.
25 Andrade's Ninth Circuit appellate briefs and to oppose the government's forfeiture
26 monetary application. This case involves an extraordinarily large record, including
27
28

1 hundreds of docket entries, extensive financial data, and multiple sealed exhibits. Mr.
2 Andrade's firsthand knowledge of the underlying transactions and documentation is
3 essential to efficient and accurate preparation of the appeal and related filings.
4

5 6. Mr. Andrade always has fully complied with the terms of his pretrial and post-sentencing
6 release. He has appeared for every proceeding, maintained contact with counsel and
7 Probation, and has demonstrated no indication of flight or danger to the community. He
8 continues to meet all supervision and reporting obligations.
9

10 7. Mr. Andrade and undersigned counsel are prepared to submit supporting medical
11 documentation under seal or *ex parte* to protect privacy under Civil Local Rule 79-5. Mr.
12 Andrade also consents to reasonable temporary conditions of release during the extension
13 period, including GPS or home-detention monitoring if the Court or Probation deems it
14 necessary.
15

16 I declare under penalty of perjury under the laws of the United States that the foregoing is
17 true and correct. Executed on October 13, 2025, at West Melbourne, Florida.
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Attorney for Defendant